

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JAB Energy Solutions II, LLC<sup>1</sup>

Debtor.

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)  
) Chapter 11  
)

) Case No. 21-11226 (CTG)  
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON  
AUGUST 10, 2022 AT 1:00 P.M. (PREVAILING EASTERN TIME)  
BEFORE THE HONORABLE CRAIG T. GOLDBLATT**

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**This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. Please register by August 9 at 4:00 p.m.**

**COURTCALL WILL NOT BE USED FOR THIS HEARING.**

**Please use the following link to register for this hearing**

**<https://debuscourts.zoomgov.com/meeting/register/vJltf--prDsQH8P90J8oo-Bq0C4VE4ArBxc>**

**After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.**

**MATTER FOR WHICH A COC HAS BEEN FILED:**

1. Debtor's Motion for Approval of the Plan Term Sheet [Filed: 7/27/22] ([Docket No. 278](#)).

Response Deadline: August 9, 2022, at 4:00 p.m.

Responses Received: Informal comments received from the Office of the United States Trustee ("U.S. Trustee").

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<sup>1</sup> The last four digits of the Debtor's U.S. tax identification number are 3625. The Debtor's mailing address is 19221 I-45 South, Suite 324, Shenandoah, TX 77385.

Related Documents:

- a. [Proposed] Order Approving Plan Term Sheet [Filed: 7/27/22] ([Docket No. 278, Exhibit A](#)).
- b. Debtor's Motion for Entry of an Order Shortening the Notice and Objection Periods for the Debtor's Motion for Approval of the Plan Term Sheet [Filed: 7/27/22] ([Docket No. 279](#)).
  - i. [Signed] Order Shortening the Notice and Objection Periods for the Debtor's Motion for Approval of the Plan Term Sheet [Filed: 7/28/22] ([Docket No. 280](#)).
- c. Notice of Hearing on Debtor's Motion for Approval of the Plan Term Sheet [Filed: 7/28/22] ([Docket No. 282](#)).
- d. Certification of Counsel Regarding Debtor's Motion for Approval of the Plan Term Sheet [Filed: TBD] (Docket No. TBD)

Status: The Debtor intends to file a revised proposed order (the "Plan Term Sheet Order") under certification of counsel prior to the hearing resolving the informal comments from the U.S. Trustee and respectfully requests entry of the Plan Term Sheet Order.

**MATTERS GOING FORWARD:**

- 2. Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 4/18/22] ([Docket No. 235](#)).

Response Deadline: May 2, 2022, at 4:00 p.m.

Responses Received:

- a. The Official Committee of Unsecured Creditors' Response to Turnkey Offshore Project Services, LLC and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112 (b) of the Bankruptcy Code [Filed: 5/2/22] ([Docket No. 241](#)).
- b. Debtor's Opposition to Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 5/2/22] ([Docket No. 242](#)).
- c. Joinder of Castlegate Credit Opportunities Fund, LLC to Debtor's Opposition to Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 5/2/22] ([Docket No. 243](#)).

Related Documents:

- a. [Proposed] Order Converting Debtor's Chapter 11 Case to a Case Under Chapter 7 of the Bankruptcy Code [Filed: 4/18/22] ([Docket No. 235, Exhibit A](#)).
- b. Notice of Adjourned Hearing on Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 5/3/22] ([Docket No. 244](#)).
- c. Second Notice of Adjourned Hearing on Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 5/18/22] ([Docket No. 254](#)).
- d. Third Notice of Adjourned Hearing on Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 7/6/22] ([Docket No. 273](#)).
- e. Fourth Notice of Adjourned Hearing on Turnkey Offshore Project Services, LLC's and Offshore Technical Solutions, LLC's Motion to Convert Bankruptcy Case Pursuant to Section 1112(b) of the Bankruptcy Code [Filed: 8/1/22] ([Docket No. 283](#)).

Status: Subject to the entry of the Plan Term Sheet Order referenced in matter #1 above, this matter will be withdrawn and no hearing will be necessary.

3. Debtor's Second Motion to Further Extend Its Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances [Filed: 5/5/22] ([Docket No. 246](#)).

Response Deadline: May 17, 2022, at 4:00 p.m. (*extended until July 1, 2022 at 4:00 p.m. for the Official Committee of Unsecured Creditors, the Office of the United States Trustee, Turnkey Offshore Project Services, LLC and Offshore Technical Solutions, LLC*)

Responses Received: None as of the date of this Notice of Agenda.

Related Documents:

- a. [Proposed] Order Further Extending Debtor's Second Motion to Further Extend Its Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances [Filed: 5/5/22] ([Docket No. 246, Exhibit A](#)).
- b. Notice of Rescheduled Hearing on Motion [Filed: 8/1/22] ([Docket No. 285](#)).

Status: Subject to the entry of the Plan Term Sheet Order referenced in matter #1 above, the Debtor will submit a proposed order approving the motion under certification of counsel and no hearing will be necessary.

Dated: August 8, 2022

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Colin R. Robinson*

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